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10 UNITED STATES DISTRICT COURT  
 11 DISTRICT OF NEVADA

12 United States of America,  
 13 Plaintiff,  
 14 v.  
 15 Marcos R. Rojos-Blancas,  
 16 Defendant.

Case No. 2:23-mj-00805-DJA  
**Stipulation and Proposed Order**

18 Mr. Rojos-Blancas was charged by complaint on August 31, 2023, with four  
 19 counts: (1) Operating a Motor Vehicle while Under the Influence of Alcohol and Drugs  
 20 (a violation of 36 C.F.R. § 4.23(a)(1)); (2) Operating a Motor Vehicle with a BAC of  
 21 0.08 Grams and Higher (a violation of 36 C.F.R. § 4.23(a)(2)); (3) Suspended Driver's  
 22 License (a violation of 36 C.F.R. § 4.2(b); N.R.S. 483.560(1)); and (4) Speeding (a  
 23 violation of 36 C.F.R. § 4.21(c)). (ECF No. 1.)

24 Mr. Rojos-Blancas entered a plea agreement on August 7, 2024. (ECF No. 18.)  
 25 Under that agreement, Mr. Rojos-Blancas pleaded guilty to Count One. (*Id.*) Counts  
 26 Two, Three, and Four were dismissed. (*Id.*) Mr. Rojos-Blancas was sentenced on  
 27 Count One as follows: "Defendant is sentenced to one year unsupervised probation;

1 \$500.00 fine and \$10.00 penalty assessment; attend and complete lower court DUI  
2 course and victim impact panel; complete eight (8) hours online alcohol awareness  
3 course; and restricted from Lake Mead National Recreational Area for six months.  
4 Should the defendant complete his obligations within the first six months of his  
5 unsupervised probation, the court will allow the defendant to withdraw his guilty  
6 plea to count one and the government will move to amend count one to reckless  
7 driving, see plea agreement.” (*Id.*)

8 Mr. Rojos-Blancas now has completed the special conditions of his  
9 unsupervised probation. Accordingly, the parties agree that Count One should be  
10 amended to Reckless Driving, and the status conference set for February 14, 2025 at  
11 11:30 AM should be vacated.

12 Dated: January 22, 2025

13 Respectfully submitted,

14  
15 Rene L. Valladares  
16 Federal Public Defender

Sue Fahami  
Acting United States Attorney

17 /s/ Rick A. Mula

/s/ Skyler H. Pearson

18 Rick A. Mula  
19 Assistant Federal Public Defender

Skyler H. Pearson  
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Marcos R. Rojos-Blancas,

Defendant.

Case No. 2:23-mj-00805-DJA

**Order**

The Court finds that Mr. Rojos-Blancas has completed the special conditions of his unsupervised probation in accordance with his plea agreement and sentence.

IT IS THEREFORE ORDERED that Mr. Rojos-Blancas is permitted to withdraw his guilty plea to Count One: Operating a Motor Vehicle Under the Influence.

IT IS FURTHER ORDERED that the Court, consistent with the plea agreement and sentence, enters a plea of guilty to Amended Count One: Reckless Driving.

IT IS FURTHER ORDERED that the status conference set for February 14, 2025 at 11:30 AM is vacated.

DATED this 22nd day of January, 2025.



UNITED STATES MAGISTRATE JUDGE